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July 20, 2017

U.S. Magistrate Judge Daniel J. Stewart
James T. Foley U.S. Courthouse
445 Broadway - 4th Floor
Albany, New York 12207

By: ECF

Re: Cinthia Thevenin, et al. v. The City of Troy, et al.
Docket No: 16-CV-01115(NAM)(DJS)

Dear Judge Stewart:

The firm of the firm of Harfenist Kraut and Perlstein, LLP along with Hach & Rose, LLP, represents the Plaintiff in this matter.

By Order dated July 7, 2017, the Court directed that certain portions of Defendant Randall French's personnel file and training records be disclosed and further Ordered the parties to submit an appropriate confidentiality agreement/protective Order prior to the production of said records.

Pursuant to the Court's directive, the parties submit the within proposed confidentiality agreement/protective Order which the parties would respectfully request that the Court "So-Order." Should the Court require any modifications to the confidentiality agreement/protective Order, the parties will of course oblige.

The parties thank the Court for its attention to this matter.

Respectfully Submitted
HARFENIST KRAUT & PERLSTEIN, LLP

By: Neil Torczyner
Neil Torczyner

CC: All counsel (via ECF only)